REMARKS

Applicants acknowledge the receipt of the Examiner's Office Action dated May 5, 2006. Claims 1-15 were allowed, with thanks. The remaining claims stand rejected under 35 U.S.C. § 102 as being anticipated by U.S. Patent No. 6,487,171 issued to Honig et al. ("Honig"). Allowed claim 9 was amended to include the limitations of allowed dependent claim 10. Claim 16 was amended to include the limitations of claim 17, and claim 17 has been cancelled. Applicants respectfully request the Examiner's reconsideration of claims 16, and 20-24 in light of the following arguments and foregoing amendments.

Applicants are very grateful to the Examiner for providing his Response to Arguments. Applicants seek clarification of the Examiner's Response to Arguments. Applicants interpret the Examiner's Response to Arguments as follows: (1) Honig teaches the generation of tags in column 1, lines 31-46. (2) Each tag is associated with a packet. (3) The tags may be for unicast, multicast, or broadcast packets. (4) A tag for a multicast packet will identify first and second destinations for that packet. Does this imply that Honig teaches first and second circuits for identifying first and second destinations for a multicast packet? If so, does the Examiner believe the first and second circuits of claim 16 read on the first and second circuits of Honig? Are the first and second destinations determined of Honig combined by a third circuit in Honig to create the tag for the multicast packet? If so, does the third circuit of claim 16 read on the third circuit of Honig?

Assuming Applicant's interpretation of the Examiner's Response to Arguments is accurate, Applicants request the Examiner's opinion. Please assume that claim 16 was not amended by incorporating the limitations of claim 17.

Application No.: 09/811,189

If Applicants were to amend independent claim 16 only by noting that the third value generated by the third circuit identifies **only** one of the plurality of data ports through which the received data frame will exit, would independent claim 16 distinguish over Honig? Applicants note that the Examiner is under no obligation to give us his opinion as to whether the foregoing amendment to claim 16 would distinguish claim 16. However, Applicants would greatly appreciate any input the Examiner can provide.

Applicants did amend independent claim 16 by adding the limitations of dependent claim 17. Independent claim 17 was rejected under 35 U.S.C. § 102 as being anticipated by Honig. Claim 17 recites that the buffer of claim 16 is coupled to the switching fabric via first and second data ports thereof. In rejecting independent claim 17, the Office Action asserts that memory 27 and queues 28 shown in Figure 2 of Honig equate to the claimed buffer, and that the memory 27 and queues 28 is/are coupled to the switch via multiple N PORTS. Applicants assert that Figure 2 does not show a buffer which is coupled to a switching fabric via first and second ports thereof. Figure 2 is a detailed view of the I/F cards. Figure 2 clearly shows there is only one port coupled to the switching matrix. Accordingly, neither memory 27 or queues 28 are coupled to the switching fabric via first and second data ports. Applicants invite the Examiner to compare Figure 6 of the instant application with Figure 2 of Honig to see that line card 608 is coupled to switching fabric 602 via two data ports. Given that the cited sections of Honig do not teach or fairly suggest a buffer coupled to the switching fabric via first and second data ports thereof, either alone or in combination with the remaining limitations of independent claim 16, Applicants assert that independent claim 16 is now patentably distinguishable.

Independent claims 20-23 each recite in one form or another generating and adding routing data to a data frame. In rejecting these claims, the Examiner asserts that adding routing data to a data frame as claimed reads on column 1, lines 31-39 of Honig, which recites having a
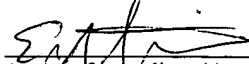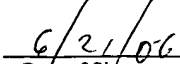
Application No.: 09/811,189

routing tag associated with the packet. Applicants assert that the Examiner has given an unreasonably broad interpretation of the phrase "adding routing data to the data frame." Applicants assert that the limitation adding routing data to the data frame requires more than just associating a tag with a packet. Specifically, with reference to Figure 7 as an example, adding routing data to a frame means inserting the routing data into the frame just as routing data 742A and 742B was inserted between destination port number 208 and data 210 of the frames shown in Figure 7. Applicants asserts equating the term "adding" with the term "associating" is improper. As such, Applicants assert that independent claims 20-23 are patentably distinguishable over the cited sections of Honig.

Claim 24 depends from independent claim 23. Insofar as independent claim 23 has been shown to be patentably distinguishable, it follows that dependent claim 24 is likewise patentably distinguishable.

CONCLUSION

Applicants submit that all claims are now in condition for allowance, and an early notice to that effect is earnestly solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is requested to telephone the undersigned.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop AF, Commissioner for Patents, P. O. Box 1450, Alexandria, Virginia, 22313-1450, on ~~June 20, 2006.~~ June 21, 2006

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